## COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE NW WASHINGTON, DC 20004-24D1 TEL 202.662.6000 FAX 202.662.6291 WWW.COV.COM WASHINGTON, DC NEW YORK LONDON BRUSSELS SAN FRANCISCO RECEIVED

RECEIVED

DANA T. ACKERLY II 10N 4 12 05-192.60 = 2 FAX 202.778.5266

12 on PH '01

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

June 1, 2001

## Open Letter to the Postal Rate Commission:

Now that proceedings in Docket No. R2000-1 have been completed, we would like to take this opportunity to thank the Commission and its staff on behalf of our client, the Direct Marketing Association, and all the other intervenors for having facilitated participation in the case through the creation and maintenance of a particularly effective website. We are especially grateful for the efforts made by your staff to post each document on the day filed, even though they were often forced to work late into the night in order to do so. As a result, we were able to rely on your website both as a source of up-to-date information and as an archive of documents previously filed.

As the Commission is well aware, an omnibus postal rate case involves a very large number of documents. Your system proved so useful and reliable that we were able to avoid creating our own "docket file" of these documents, a step that had been necessary in the past. Moreover, the search capabilities of the website enabled us to locate information quickly and efficiently. Finally, since they were able to rely on the website for these purposes, a number of intervenors agreed not to require service of many types of documents in paper form, saving all parties substantial amounts in copying and mailing costs.

The most burdensome problems that were ameliorated by your system include the following:

- 1. Receiving timely notice of filings. In the past, all parties had to rely on the mails to receive notice of each document filed. Delays were common, causing significant problems, especially in light of the tight time schedules applicable to PRC rate cases. Under your system, all filings were available in the "Daily Listings" portion of your website no later than the beginning of the day after they are filed.
- 2. Avoiding the need for a paper-based docket file. The traditional method of keeping track of documents in postal rate cases required indexing and filing a paper copy of virtually every document filed. This task was quite burdensome, requiring the full-time services of a paralegal and large amounts of secretarial assistance. Because we could rely on the Commission's website for the complete set, our own files could be much smaller, containing only those documents in which we were most interested.
- 3. Retrieving relevant documents. Creating a complete docket file is only half the battle. There also must be a system for locating documents relevant to particular subjects. In recent years, we

## COVINGTON & BURLING

U.S. Postal Rate Commission June 1, 2001 Page 2

have attempted to create such a system using OCR software and electronically searchable databases. We have learned that these retrieval systems work effectively only if a great deal of effort is invested in their creation. Your system provided a search mechanism that enabled us substantially to reduce the scope of our own document retrieval efforts.

We estimate that our client alone saved at least \$50,000 in this past rate case as a result of our being able to rely on the Commission's website for the purposes described above. Cost savings of this magnitude are important to major intervenors such as our client; they are even more important to the smaller intervenors.

Please accept our thanks for your efforts in this regard. We look forward to working with you in the future to make the Commission's website as effective as possible.

Sincerely yours,

Dana T. Ackerly II
Counsel for the Direct Marketing

Association, Inc./